The Honorable John C. Coughenour 1 2 3 4 5 UNITED STATES DISTRICT COURT 6 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 7 MICROSOFT CORPORATION, 8 CASE NO. C13-02245-JCC Plaintiff, 9 JOINT STIPULATED MOTION AND [PROPOSED] ORDER REQUESTING 10 v. EXTENSION OF TIME FOR DEFENDANT TO RESPOND TO 11 SICHUAN CHANGHONG ELECTRIC COMPLAINT BY 30 DAYS PURSUANT COMPANY, LTD., TO LCR 7(d)(1) 12 Defendant. NOTE ON MOTION CALENDAR: 13 February 21, 2014 14 15 **STIPULATION** 16 Pursuant to Local Civil Rule 7(d)(1), Plaintiff Microsoft Corporation ("Microsoft") and 17 Specially Appearing Defendant Sichuan Changhong Electric Company, Ltd. ("Changhong"), by 18 and through their undersigned counsel, stipulate as follows: 19 WHEREAS, Microsoft initiated this action on December 17, 2013; 20 WHEREAS, Changhong agreed to waive service of a summons and the complaint in this 21 action; 22 WHEREAS, Changhong's current deadline to respond to the Complaint is March 5, 2014; 23 WHEREAS, the parties are currently involved in settlement negotiations in an attempt to 24 settle this matter in its early stages; 25 26 SUMMIT LAW GROUP PLLC

JOINT STIPULATED MOTION AND [PROPOSED] ORDER REQUESTING EXTENSION OF TIME FOR DEFENDANT TO RESPOND TO COMPLAINT BY 30 DAYS PURSUANT TO LCR 7(d)(1) - 1 CASE NO. C13-02245-JCC

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WHEREAS, in light of the fact that the parties are currently engaged in on-going 1 2 settlement negotiations, the parties have agreed that the deadline for Changhong to respond to the 3 Complaint may be extended by thirty (30) days, to and including April 4, 2014; WHEREAS, no previous extension of time has been requested; 4 WHEREAS, by filing this stipulated motion to extend time to respond to the Complaint, 5 Changhong does not make a general appearance or waive any jurisdictional defenses or objections, 6 7 including but not limited to defenses or objections for lack of personal jurisdiction or improper 8 venue. See Benny v. Pipes, 799 F.2d 489, 493 (9th Cir. 1986) (filing motion to extend time to 9 respond to complaint did not constitute general appearance or waiver of jurisdictional objections); DATED this 21st day of February, 2014. 10 11 K&L GATES LLP SUMMIT LAW GROUP PLLC Attorneys for Plaintiff Microsoft Corporation Attorneys for Specially Appearing Defendant 12 Sichuan Changhong Electric Company, Ltd. 13 By /s/ David L. Bateman By /s/ Philip S. McCune 14 David A. Bateman, WSBA #14262 By /s/ Denise L. Ashbaugh david.bateman@klgates.com Philip S. McCune, WSBA #21081 15 Denise L. Ashbaugh, WSBA #28512 philm@summitlaw.com 16 denisea@summitlaw.com 17 **ORDER** 18 Based on the above Stipulation of the parties, IT IS HEREBY ORDERED that 19 Changhong's deadline to respond to the Complaint shall be extended by thirty (30) days, to and 20 including April 4, 2014. 21 IT IS SO ORDERED 22 DATED this \_\_\_\_\_ day of \_\_\_\_\_\_, 2014. 23 24 THE HONORABLE JOHN C. COUGHENOUR 25 UNITED STATES DISTRICT JUDGE 26

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